



Defendants<sup>1</sup> (the “Settlement” or “Settlement Agreement”), (2) preliminarily certifying the Settlement Class, (3) approving the form and manner of providing notice of the Settlement to the proposed Settlement Class (the “Notice Plan”), and (4) scheduling a Fairness Hearing. In support of this unopposed motion, Plaintiffs have submitted a memorandum of law contemporaneously.

For the reasons set forth in the accompanying memorandum of law, Plaintiffs submit that the proposed Settlement is fair, reasonable, and adequate. Additionally, the proposed Settlement Class satisfies the requirements of Federal Rule of Civil Procedure 23(a) and (b)(1), thereby warranting preliminary certification for the purposes of this Settlement. Moreover, the Notice Plan satisfies the requirements of due process and is consistent with that used in analogous actions. Accordingly, Plaintiffs respectfully submit that preliminary approval of the Settlement should be granted, the Settlement Class should be preliminarily certified, the Notice Plan should be approved, and a Fairness Hearing should be scheduled.

A Proposed Order is submitted hereto.

DATED: August 20, 2020

Respectfully submitted,

/s/ Mark K. Gyandoh

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<sup>1</sup> “Defendants” refers, collectively, to BTG International, Inc., and BTG International, Inc., Profit Sharing 401(k) Plan.

**CERTIFICATE OF SERVICE**

I certify that, on August 20, 2020, I caused the foregoing Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement, Preliminary Certification of Settlement Class, Approval of Class Notice, and Scheduling of a Fairness Hearing to be filed with the Clerk of the Court via the CM/ECF system, which will deliver notification of filing to all counsel of record.

/s/ Mark K. Gyandoh  
Mark K. Gyandoh, Esquire